

# **Exhibit 6 Hawaii Proposals**

**MDL 3047 – 2024-12-09 Agency Discovery JLB**  
**Hawai'i – Meta Proposal**

**Search Terms:** On December 7, 2024, Meta made its most recent counterproposal to the Hawai'i (i) Department of Health, (ii) Department of Human Services, (iii) Department of Budget and Finance, (iv) Department of Business, Economic Development, & Tourism, (v) Department of Commerce and Consumer Affairs, (vi) State Council on Mental Health, and (vii) Office of the Governor. Meta made its most recent counterproposal on December 4, 2024 to the Hawai'i Department of Education.

At a high level, Meta's counterproposal (other than to the Department of Education) involves using search combinations that require either "Social Media Terms" or substantive "Harm Terms" to occur in the same document or "within 150" of one of the following "Youth Terms":

(teen\* OR tween\* OR adolescen\* OR kid\* OR youth\* OR minor\* OR young\* OR child\* OR underage\* OR "under-age" OR juvenile\* OR "pre-teen\*" OR preteen\* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen z" OR "generation z" OR generation-z OR genz OR generationz OR OR "gen-z" OR "gen alpha" OR "generation alpha" OR gen-alpha OR generation-alpha OR genalpha OR gen-a\* OR scholar\* OR School\* OR student\* OR pupil\* OR grade\*)

**Youth-focused custodians**

- Leanne Gillespei, Office of Youth Services (DHS)
- Elladine Olevao, Child Welfare Services Branch (DHS)
- Keli Acquaro, Child & Adolescent Mental Health Division (DOH)
- Ian Tholen, Children with Special Health Needs Branch (DOH)

#	Social Media Terms
1	"Youth Terms" w/150 ("social media" OR "social network" OR Meta OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* or "direct message")

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	Harm Terms
2	“Youth Terms” <b>w/150</b> (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3	“Youth Terms” <b>AND</b> (“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)
4	“Youth Terms” <b>w/150</b> (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5	“Youth Terms” <b>w/150</b> (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6	“Youth Terms” <b>AND</b> (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	(negative w/3 (appearance OR experience OR affect* OR effect*))
10	(compar* w/5 (appearance OR social OR other* OR negative))
11	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	“Youth Terms” <b>AND</b> (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)

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14	“Youth Terms” <b>AND</b> (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)
15	“Youth terms” <b>w/150</b> (polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)
16	“mental health” <b>w/25</b> (teen* OR tween* OR kid* OR youth* OR minor* OR young OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen z” OR “generation z” OR generation-z OR genz OR generationz OR OR “gen-z” OR “gen alpha” OR “generation alpha” OR gen-alpha OR generation-alpha OR genalpha OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

All other custodians

#	Social Media Terms
1	“Youth Terms” <b>w/150</b> (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* or “direct message”)
	Harm Terms
2	“Youth Terms” <b>w/150</b> (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)

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3	“Youth Terms” <b>w/150</b> (“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)
4	“Youth Terms” <b>w/150</b> (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5	“Youth Terms” <b>w/150</b> (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6	“Youth Terms” <b>AND</b> (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	(negative w/3 (appearance OR experience OR affect* OR effect*))
10	(compar* w/5 (appearance OR social OR other* OR negative))
11	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	“Youth Terms” <b>w/150</b> (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14	“Youth Terms” <b>w/150</b> (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

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15	“Youth terms” w/150 (polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)
16	“mental health” w/25 (teen* OR tween* OR kid* OR youth* OR minor* OR young OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen z” OR “generation z” OR generation-z OR genz OR generationz OR OR “gen-z” OR “gen alpha” OR “generation alpha” OR gen-alpha OR generation-alpha OR genalpha OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

Department of Education

#	Social Media Terms
1	(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* or “direct message”)
	Harm Terms
2	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3	(“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)

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4	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	(negative w/3 (appearance OR experience OR affect* OR effect*))
10	(compar* w/5 (appearance OR social OR other* OR negative))
11	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)
15	(polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)

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16	<p>“mental health” w/25 (teen* OR tween* OR kid* OR youth* OR minor* OR young OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen z” OR “generation z” OR generation-z OR genz OR generationz OR OR “gen-z” OR “gen alpha” OR “generation alpha” OR gen-alpha OR generation-alpha OR genalpha OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)</p>



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**Custodians:** Meta proposes that the above search terms be run on each agency's custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012, to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the "Relevant Time[]" in Plaintiffs' Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a "Relevant Time[]" that starts "no later than 2012").

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (\*) have been affirmatively proposed and agreed to by the Hawai'i AG's office during the course of the Parties' negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Budget & Finance	Derek Chan*	Program Budget Analyst, Budget, Program Planning, and Management Division
Department of Business, Economic Development & Tourism	James Tokioka*	Director
Department of Business, Economic Development & Tourism	Chung Chang*	Strategic Broadband Coordinator, Broadband and Digital Equity Office
Department of Business, Economic Development & Tourism	Dr. Eugene Tian*	Economic Research Administrator, Research & Economic Analysis Division
Department of Human Services	Cathy Betts*	Former Director
Department of Human Services	Ryan Yamane*	Current Director

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Department of Human Services	Leanne Gillespei*	Executive Director, Office of Youth Services
Department of Human Services	Daisy Lynn Hartsfield*	Administrator, Social Services Division
Department of Human Services	Elladine Olevao*	Administrator, Child Welfare Services Branch
Office of the Governor – Office of Wellness & Resilience	Tia Hartsock*	Director
Office of the Governor – Office of Wellness & Resilience	Trina Orimoto*	Deputy Director
Office of the Governor – Office of Wellness & Resilience	Erica Yamauchi*	Director of Communications
Office of the Governor – Office of Wellness & Resilience	Jodie Burgess*	Procurement and Contract Specialist
Office of the Governor – Office of Wellness & Resilience	Keala Kaopuiki-Santos*	Project Manager
Office of the Governor – Office of Wellness & Resilience	Naomi Leipold*	Project Manager
Office of the Governor – Office of Wellness & Resilience	Kevin Thompson*	Project Manager
Office of the Governor – Office of Wellness & Resilience	Annie Valentin*	Advisor for Public Health

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Office of the Governor – Office of Wellness & Resilience	Rachel (Aquino) Nunies*	Graduate Research Assistant
Office of the Governor	Michael Champion*	Senior Advisor for Mental Health and the Justice System to Governor Josh Green
State Council on Mental Health	doh.scmhchairperson@doh.hawaii.gov*	SCMH Chairperson
State Council on Mental Health	Carolyn Weygan-Hildebrand*	Planner, Adult Mental Health Division, Planning Information Evaluation and Research Branch
State Council on Mental Health	Stacy Haitsuka*	Prior custodian of records
Department of Commerce & Consumer Affairs	Nadine Ando*	Director
Department of Commerce & Consumer Affairs	Mana Moriarty*	Executive Director, Office of Consumer Protection
Department of Commerce & Consumer Affairs	Collenn Yuen*	Secretary, Broadband Assistant Advisory Council of the Cable Television Division
Department of Health	Kenneth Fink*	Director
Department of Health	Keli Acquaro*	Administrator, Child & Adolescent Mental Health Division
Department of Health	John Valera*	Administrator, Alcohol and Drug Abuse Division

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Department of Health	Lola Irvin*	Administrator, Chronic Disease Prevention and Health Promotion Division
Department of Health	Lorrin Kim*	Chief Policy Officer and Legislative Coordinator, Office of Planning, Policy and Program Development
Department of Health	Ian Tholen*	Administrative Specialist, Children with Special Health Needs Branch; Early Intervention Section
Department of Health	Valerie Kato*	Deputy Director of Health
Department of Health	Debbie Kim Morikawa*	Deputy Director of Health Resources
Department of Health	Marian Tsuji*	Deputy Director of Behavioral Health
Department of Education	Keith Hayashi*	Superintendent
Department of Education	Michael Otsuji*	Assistant Superintendent, Office of Information and Technology
Department of Education	Brain Hallett*	Assistant Superintendent, Office of Fiscal Services
Department of Education	Ken Kakesako*	Director, Office of Planning and Evaluation Services

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Department of Education	Helen Kaniho*	Exception Support Branch Education Director, Office of Student Support Services
Department of Education	Sean Bacon*	Assistant Superintendent, Office of Talent Management
Department of Education	Denise Yoshida*	Internal Audit Director
Department of Education	Nanea Ching*	Public Relations and Communications Director
Department of Education	Elizabeth Higashi*	Assistant Superintendent, Community Engagement Branch, Office of Strategy, Innovation and Performance

**MDL 3047**

**Summary of Hawaii's Search Term Negotiation Proposals**

November 22, 2024

Meta's revised search term proposal: see below.

December 5, 2024

Hawaii's proposal:

- For search strings under 10 GBs, Hawai'i proceeds with reviewing and producing responsive documents.
- For search strings between 10-99 GBs, Hawai'i reserves its right to challenge any search terms based on a review of the hit counts.
- For search strings over 100 GBs, Hawai'i will propose redlines after reviewing the breakdown of the final hit counts.

December 7, 2024

Meta accepts the first prong, which applies to search strings 7, 8, and 10 of the youth focused searches and 7, 8, and 10-12 of the non-youth focused searches.

Meta's updated proposal:

1. Part I terms NEAR(150) of Part II terms on all strings currently bringing back over 100,000 documents:
  1. Non-youth focused: 1-5, 13-15
  2. Youth-focused: 1-2, 4-5, and 15
2. Part I terms AND Part II terms on remaining strings bringing back less than 100,000 documents:
  1. Non-youth focused: 6
  2. Youth-focused: 3, 6, and 13-14

December 8, 2024

Hawai'i agrees to run Meta's updated proposal from 12/7 except for non-youth set 6, as the proposal appears identical to Meta's original instructions for the set.

Hawai'i continues to reserve its rights to challenge any search strings with excessive hits.

Hawaii's proposes the same approach for its Department of Education (DOE) once DOE's hit report is finalized: DOE will move forward with reviewing and producing documents from search strings without excessive hits while running Meta's new proposed search from 12/7 for search strings with excessive hits.

**I. Search Strings for Youth Focused Agencies**

<b><i>Search Set 1 – Youth Use of Social Media</i></b>	
1.	(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”)
<b><i>Search Set 2 – Youth Mental Health / Wellbeing Issues</i></b>	
2.	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3.	(“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5.	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6.	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime OR staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)

7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9.	(negative w/3 (appearance OR experience OR affect* OR effect*))
10.	(compar* w/5 (appearance OR social OR other* OR negative))
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13.	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

### ***Search Set 3 – Other Case Issues***

15.	(polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)
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## **II. Search Strings for Non-Youth-Focused Agencies**

All search strings referenced above run against below “Youth” gating terms with “AND” connector.

(teen\* OR tween\* OR adolescen\* OR kid\* OR youth\* OR minor\* OR young\* OR child\* OR underage\* OR “under-age” OR juvenile\* OR “pre-teen\*” OR preteen\* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen\* z” OR “gen-z” OR “gen\* alpha” OR gen-a\* OR scholar\* OR School\* OR student\* OR pupil\* OR grade\*)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; Meta Platforms Technologies, LLC,

MDL No. 3047

Case Nos. 4:23-cv-05448-YGR  
4:23-cv-05885-YGR  
4:24-cv-00805-YGR

Office of the Attorney General, State of Florida,  
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta Payments, Inc.

**DECLARATION OF PATRICK S.  
STUART IN SUPPORT OF STATE OF  
HAWAII'S DECEMBER 9, 2024 LETTER  
BRIEFING**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

State of Montana, *ex rel.* Austin Knudsen,  
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook Holdings, LLC, Facebook Operations, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION THIS  
DOCUMENT RELATES TO:

4:23-cv-05448, 4:23-cv-05885; 4:24-cv-00805.

1 I, Patrick S. Stuart, hereby declare and state as follows:

2 1. I am the Section Manager for the State of Hawai'i Office of Enterprise Technology  
3 Services (ETS), which provides support for computer and telecommunication services to  
4 executive branch agencies in Hawai'i, including the Department of the Attorney General (AG).

5 2. I make this declaration based upon personal knowledge and in support of the State  
6 of Hawaii's December 9, 2024 letter briefing.

7 3. On the afternoon of November 22, 2024, ETS received a request from the AG to  
8 run revised search terms from Meta Platforms, Inc.'s counsel.

9 4. The scope and scale of the requested searches in this case is extraordinarily large  
10 for ETS, prompting our office to engage a team of employees to tackle the requests.

11 5. ETS uses Microsoft Purview for its e-discovery, which was upgraded to the  
12 premium version in response to the request.

13 6. ETS has been made aware of the Court's deadlines and is making great efforts to  
14 facilitate the hit reports, including working overtime.

15 7. However, due to the size and scope of the request, running the search terms takes  
16 several days.

17 8. Per Meta's instructions, ETS ran two sets of searches, one for youth-focused  
18 agencies and another for non-youth focused agencies.

19 9. As of December 6, 2024, the combined results of the two searches total over 4.8  
20 Terabytes and have detected over 6.6 million committed items.

21 10. Attached as Exhibit "B" is a true and correct copy of the search results for youth-  
22 focused agencies as of December 6, 2024.

23 11. Attached as Exhibit "C" is a true and correct copy of the search results for youth-  
24 focused agencies as of December 6, 2024.

25 12. These search results have yet to be de-duplicated and will likely take substantial  
26 time and resources to do so.

27 13. Specifically, Purview only permits de-duplication within search sets. As such,  
28 ETS will need to combine the search results into a combined review set to de-duplicate the

1 results, which will take additional time.

2 14. ETS has also arranged for a meeting with a representative from Microsoft next  
3 week for technical assistance in refining the search process.

4 15. ETS constantly updates the AG with its progress and will continue to do so to  
5 expedite e-discovery for Hawaii's state agencies.

6 I declare under penalty of perjury under the laws of the United States of America that the  
7 foregoing is true and correct.

8 Executed on December 9, 2024, in Honolulu, Hawai'i.

9  
10 /s/ *Patrick Stuart*

11 \_\_\_\_\_  
Patrick S. Stuart

# EXHIBIT B

Review set	Size	Created by	Last modified (UTC-10:00)	Modified by	Collections		Description	Committed Items
					(sources)	Exports	n	
Set 1	84.11 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:03:29.000Z	mishkat.rahman.admin@hawaii.gov	1	0		416,260
Set 2	174.93 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:03:58.000Z	mishkat.rahman.admin@hawaii.gov	1	0		717,274
Set 3	38.07 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:04:20.000Z	mishkat.rahman.admin@hawaii.gov	1	0		36,224
Set 4	80.15 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:04:49.000Z	mishkat.rahman.admin@hawaii.gov	1	0		108,477
Set 5	125.5 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:05:35.000Z	mishkat.rahman.admin@hawaii.gov	1	0		201,011
Set 6	13.35 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:05:58.000Z	mishkat.rahman.admin@hawaii.gov	1	0		6,960
Set 7	198.4 MB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:06:25.000Z	mishkat.rahman.admin@hawaii.gov	1	0		15
Set 8	262.79 MB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:06:46.000Z	mishkat.rahman.admin@hawaii.gov	1	0		18
Set 10	70.13 MB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:07:57.000Z	mishkat.rahman.admin@hawaii.gov	1	0		165
Set 13	52.25 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:08:38.000Z	mishkat.rahman.admin@hawaii.gov	1	0		76,434
Set 14	73.17 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:09:00.000Z	mishkat.rahman.admin@hawaii.gov	1	0		67,425
Set 15	333.77 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:09:50.000Z	mishkat.rahman.admin@hawaii.gov	1	0		744,829

# EXHIBIT C

Review set	Size	Created by	Last modified (UTC-10:00)	Modified by	Collection: Exports	Description	Committed Items
Set 1	410.06 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:14:17.000Z	mishkat.rahman.admin@hawaii.gov	1	0	416,260
Set 2	646.18 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:14:38.000Z	mishkat.rahman.admin@hawaii.gov	1	0	717,274
Set 3	263.1 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:18:04.000Z	mishkat.rahman.admin@hawaii.gov	1	0	233,864
Set 4	354.58 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:18:34.000Z	mishkat.rahman.admin@hawaii.gov	1	0	358,968
Set 5	531.59 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:19:30.000Z	mishkat.rahman.admin@hawaii.gov	1	0	626,467
Set 6	97.12 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:20:28.000Z	mishkat.rahman.admin@hawaii.gov	1	0	60,778
Set 7	2.12 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:22:02.000Z	mishkat.rahman.admin@hawaii.gov	1	0	881
Set 8	1.58 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:22:24.000Z	mishkat.rahman.admin@hawaii.gov	1	0	832
Set 10	3.58 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:24:00.000Z	mishkat.rahman.admin@hawaii.gov	1	0	1,312
Set 11	31.47 MB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:25:35.000Z	mishkat.rahman.admin@hawaii.gov	1	0	4
Set 12	101.41 MB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:25:54.000Z	mishkat.rahman.admin@hawaii.gov	1	0	16
Set 13	294.5 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:26:20.000Z	mishkat.rahman.admin@hawaii.gov	1	0	301,545
Set 14	436.53 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:27:08.000Z	mishkat.rahman.admin@hawaii.gov	1	0	454,233
Set 15	813.13 GB	mishkat.rahman.admin@hawaii.gov	2024-12-04T17:27:35.000Z	mishkat.rahman.admin@hawaii.gov	1	0	1,132,339



**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc.; Instagram, LLC; Meta  
Payments, Inc.; Meta Platforms Technologies,  
LLC,

MDL No. 3047

Case Nos. 4:23-cv-05448-YGR  
4:23-cv-05885-YGR  
4:24-cv-00805-YGR

Office of the Attorney General, State of Florida,  
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta  
Payments, Inc.

**DECLARATION OF TRAVIS FALLON  
IN SUPPORT OF STATE OF HAWAII'S  
DECEMBER 9, 2024 LETTER BRIEFING**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

State of Montana, *ex rel.* Austin Knudsen,  
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook  
Holdings, LLC, Facebook Operations, LLC,  
Meta Payments, Inc., Meta Platforms  
Technologies, LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION THIS  
DOCUMENT RELATES TO:

4:23-cv-05448, 4:23-cv-05885; 4:24-cv-00805.

1 I, Travis Fallon, hereby declare and state as follows:

2 1. I am the Litigation Coordinator for the State of Hawai'i Department of  
3 Education's (DOE) Office of the Superintendent which provides support for litigation and legal  
4 issues affecting the DOE.

5 2. I make this declaration based upon personal knowledge and in support of the State  
6 of Hawaii's December 9, 2024 letter briefing.

7 3. The DOE utilizes Google Vault to store documents and information that may be  
8 subject to discovery in this litigation.

9 4. Based on conversations with DOE IT specialists, I understand Google Vault has  
10 certain technical limitations. For example, the program is unable to discern which search terms  
11 trigger high hit counts without running each search individually.

12 5. The scope and scale of the requested searches in this case is extraordinarily large  
13 for our IT Office.

14 6. Due to the size and scope of the request, running the search terms takes substantial  
15 time and effort.

16 7. On December 5, 2024, our IT office prepared a snapshot of the ongoing hit counts,  
17 which had reached around 1.5 million hits. A true and correct copy of the hit report is attached as  
18 Exhibit "A."

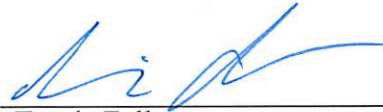
19 8. These search results have yet to be de-duplicated and will likely take substantial  
20 time and resources to do so.

21 9. I am aware of the Court's deadlines and am making great efforts to compile and  
22 send the hit reports to counsel.

23  
24 [Signature on following page]  
25  
26  
27  
28

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3 Executed on December 6, 2024, in Honolulu, Hawai'i.

4  
5   
6 Travis Fallon

# Exhibit A

Query	Individual	EmpID	Amount			
Search Set 1: Query 1	Keith Hayashi	10014013	96,381		Total Number of emails	
Search Set 2: Query 2	Keith Hayashi	10014013	44,389		1,488,106	
Search Set 2: Query 3	Keith Hayashi	10014013	5,949			
Search Set 2: Query 4	Keith Hayashi	10014013	11,781			
Search Set 2: Query 5	Keith Hayashi	10014013	24,136			
Search Set 2: Query 6	Keith Hayashi	10014013	20,267			
Search Set 2: Query 7	Keith Hayashi	10014013	748			
Search Set 2: Query 8	Keith Hayashi	10014013	329			
Search Set 2: Query 9	Keith Hayashi	10014013	37			
Search Set 2: Query 10	Keith Hayashi	10014013	1,273			
Search Set 2: Query 11	Keith Hayashi	10014013	35			
Search Set 2: Query 12	Keith Hayashi	10014013	147			
Search Set 2: Query 13	Keith Hayashi	10014013	24,619			
Search Set 2: Query 14	Keith Hayashi	10014013	7,476			
Search Set 3	Keith Hayashi	10014013	131,631			
Search Set 1: Query 1	Michael Otsuji	20381147	7,261			
Search Set 2: Query 2	Michael Otsuji	20381147	3,219			
Search Set 2: Query 3	Michael Otsuji	20381147	568			
Search Set 2: Query 4	Michael Otsuji	20381147	1,502			
Search Set 2: Query 5	Michael Otsuji	20381147	4,043			
Search Set 2: Query 6	Michael Otsuji	20381147	2,096			
Search Set 2: Query 7	Michael Otsuji	20381147	25			
Search Set 2: Query 8	Michael Otsuji	20381147	26			
Search Set 2: Query 9	Michael Otsuji	20381147	3			
Search Set 2: Query 10	Michael Otsuji	20381147	300			
Search Set 2: Query 11	Michael Otsuji	20381147	9			
Search Set 2: Query 12	Michael Otsuji	20381147	24			
Search Set 2: Query 13	Michael Otsuji	20381147	727			
Search Set 2: Query 14	Michael Otsuji	20381147	413			
Search Set 3	Michael Otsuji	20381147	24,985			
Search Set 1: Query 1	Brian Hallet	10085118	19,219			
Search Set 2: Query 2	Brian Hallet	10085118	13,579			

Query	Individual	EmpID	Amount			
Search Set 2: Query 3	Brian Hallet	10085118	2,664			
Search Set 2: Query 4	Brian Hallet	10085118	4,793			
Search Set 2: Query 5	Brian Hallet	10085118	7,004			
Search Set 2: Query 6	Brian Hallet	10085118	7,698			
Search Set 2: Query 7	Brian Hallet	10085118	143			
Search Set 2: Query 8	Brian Hallet	10085118	42			
Search Set 2: Query 9	Brian Hallet	10085118	26			
Search Set 2: Query 10	Brian Hallet	10085118	1,000			
Search Set 2: Query 11	Brian Hallet	10085118	33			
Search Set 2: Query 12	Brian Hallet	10085118	72			
Search Set 2: Query 13	Brian Hallet	10085118	9,262			
Search Set 2: Query 14	Brian Hallet	10085118	3,374			
Search Set 3	Brian Hallet	10085118	68,045			
Search Set 1: Query 1	Ken Kakesako	10056903	37,240			
Search Set 2: Query 2	Ken Kakesako	10056903	17,904			
Search Set 2: Query 3	Ken Kakesako	10056903	2,490			
Search Set 2: Query 4	Ken Kakesako	10056903	6,752			
Search Set 2: Query 5	Ken Kakesako	10056903	12,916			
Search Set 2: Query 6	Ken Kakesako	10056903	8,653			
Search Set 2: Query 7	Ken Kakesako	10056903	207			
Search Set 2: Query 8	Ken Kakesako	10056903	117			
Search Set 2: Query 9	Ken Kakesako	10056903	4			
Search Set 2: Query 10	Ken Kakesako	10056903	954			
Search Set 2: Query 11	Ken Kakesako	10056903	28			
Search Set 2: Query 12	Ken Kakesako	10056903	85			
Search Set 2: Query 13	Ken Kakesako	10056903	9,871			
Search Set 2: Query 14	Ken Kakesako	10056903	3,461			
Search Set 3	Ken Kakesako	10056903	99,526			
Search Set 1: Query 1	Helen Kaniho	10077250	24,414			
Search Set 2: Query 2	Helen Kaniho	10077250	21,603			
Search Set 2: Query 3	Helen Kaniho	10077250	1,680			
Search Set 2: Query 4	Helen Kaniho	10077250	4,032			

Query	Individual	EmpID	Amount			
Search Set 2: Query 5	Helen Kaniho	10077250	7,615			
Search Set 2: Query 6	Helen Kaniho	10077250	6,418			
Search Set 2: Query 7	Helen Kaniho	10077250	415			
Search Set 2: Query 8	Helen Kaniho	10077250	300			
Search Set 2: Query 9	Helen Kaniho	10077250	28			
Search Set 2: Query 10	Helen Kaniho	10077250	677			
Search Set 2: Query 11	Helen Kaniho	10077250	46			
Search Set 2: Query 12	Helen Kaniho	10077250	168			
Search Set 2: Query 13	Helen Kaniho	10077250	4,674			
Search Set 2: Query 14	Helen Kaniho	10077250	3,087			
Search Set 3	Helen Kaniho	10077250	58,374			
Search Set 1: Query 1	Sean Bacon	10002079	26,035			
Search Set 2: Query 2	Sean Bacon	10002079	22,195			
Search Set 2: Query 3	Sean Bacon	10002079	5,195			
Search Set 2: Query 4	Sean Bacon	10002079	8,801			
Search Set 2: Query 5	Sean Bacon	10002079	11,276			
Search Set 2: Query 6	Sean Bacon	10002079	11,586			
Search Set 2: Query 7	Sean Bacon	10002079	258			
Search Set 2: Query 8	Sean Bacon	10002079	154			
Search Set 2: Query 9	Sean Bacon	10002079	19			
Search Set 2: Query 10	Sean Bacon	10002079	969			
Search Set 2: Query 11	Sean Bacon	10002079	40			
Search Set 2: Query 12	Sean Bacon	10002079	170			
Search Set 2: Query 13	Sean Bacon	10002079	9,155			
Search Set 2: Query 14	Sean Bacon	10002079	4,240			
Search Set 3	Sean Bacon	10002079	92,258			
Search Set 1: Query 1	Denise Yoshida	10021187	10,446			
Search Set 2: Query 2	Denise Yoshida	10021187	7,582			
Search Set 2: Query 3	Denise Yoshida	10021187	1,304			
Search Set 2: Query 4	Denise Yoshida	10021187	4,314			
Search Set 2: Query 5	Denise Yoshida	10021187	7,348			
Search Set 2: Query 6	Denise Yoshida	10021187	4,793			

Query	Individual	EmpID	Amount			
Search Set 2: Query 7	Denise Yoshida	10021187	79			
Search Set 2: Query 8	Denise Yoshida	10021187	58			
Search Set 2: Query 9	Denise Yoshida	10021187	18			
Search Set 2: Query 10	Denise Yoshida	10021187	492			
Search Set 2: Query 11	Denise Yoshida	10021187	3			
Search Set 2: Query 12	Denise Yoshida	10021187	58			
Search Set 2: Query 13	Denise Yoshida	10021187	3,664			
Search Set 2: Query 14	Denise Yoshida	10021187	2,327			
Search Set 3	Denise Yoshida	10021187	39,026			
Search Set 1: Query 1	Elizabeth Higashi	10123437	23,465			
Search Set 2: Query 2	Elizabeth Higashi	10123437	20,680			
Search Set 2: Query 3	Elizabeth Higashi	10123437	1,987			
Search Set 2: Query 4	Elizabeth Higashi	10123437	3,341			
Search Set 2: Query 5	Elizabeth Higashi	10123437	8,045			
Search Set 2: Query 6	Elizabeth Higashi	10123437	17,804			
Search Set 2: Query 7	Elizabeth Higashi	10123437	233			
Search Set 2: Query 8	Elizabeth Higashi	10123437	81			
Search Set 2: Query 9	Elizabeth Higashi	10123437	10			
Search Set 2: Query 10	Elizabeth Higashi	10123437	421			
Search Set 2: Query 11	Elizabeth Higashi	10123437	17			
Search Set 2: Query 12	Elizabeth Higashi	10123437	76			
Search Set 2: Query 13	Elizabeth Higashi	10123437	6,694			
Search Set 2: Query 14	Elizabeth Higashi	10123437	2,277			
Search Set 3	Elizabeth Higashi	10123437	55,157			
Search Set 1: Query 1	Nanea Ching	20275866	38,981			
Search Set 2: Query 2	Nanea Ching	20275866	21,147			
Search Set 2: Query 3	Nanea Ching	20275866	2,926			
Search Set 2: Query 4	Nanea Ching	20275866	5,982			
Search Set 2: Query 5	Nanea Ching	20275866	17,848			
Search Set 2: Query 6	Nanea Ching	20275866	8,947			
Search Set 2: Query 7	Nanea Ching	20275866	592			
Search Set 2: Query 8	Nanea Ching	20275866	203			



Query	Individual	EmpID	Amount			
Search Set 2: Query 9	Nanea Ching	20275866	43			
Search Set 2: Query 10	Nanea Ching	20275866	814			
Search Set 2: Query 11	Nanea Ching	20275866	34			
Search Set 2: Query 12	Nanea Ching	20275866	39			
Search Set 2: Query 13	Nanea Ching	20275866	15,015			
Search Set 2: Query 14	Nanea Ching	20275866	3,572			
Search Set 3	Nanea Ching	20275866	72,720			